

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

TRACI ST. CLAIRE)	
)	
Plaintiff,)	CIVIL ACTION FILE
)	
v.)	NO. 1:17-cv-03370-AT-JFK
)	
DITECH FINANCIAL, LLC,)	
f/k/a GREEN TREE SERVICING, LLC)	
)	
Defendant.)	

CONSENT MOTION FOR EXTENSION OF TIME

COME NOW Plaintiff and Defendants Ditech Financial, LLC f/k/a Green Tree Servicing, LLC (“Ditech”) by and through their undersigned counsel, pursuant to Fed. R. Civ. P. 6(b)(1) and Local Civil Rule 7.4, jointly submit this Consent Motion for an extension of time to and including December 4, 2017, within which Ditech is to file their answer or otherwise respond to Plaintiff’s Complaint for Damages. In support thereof, Ditech states as follows:

The Parties have conferred regarding additional time to prepare an answer or otherwise respond to Plaintiff’s Complaint for Damages, to discuss the facts, and to discuss potential resolution. Counsel for Plaintiff is agreeable to the requested extension. This is the first request for such an extension.

WHEREFORE, Defendants Ditech hereby requests that the Court enter an Order: (1) granting Ditech Consent Motion for an Extension of Time; and (2) providing Ditech with an extension of time to file its answer until on or before December 4, 2017. A proposed order is attached as **Exhibit A** hereto for the Court's consideration.

Respectfully submitted, this 28th day of September 2017.

Prepared and Consented to by:

/s/ Mark J. Windham

Mark J. Windham

Georgia Bar No. 113194

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Consented to by:

/s/ James W. Hurt

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify that I electronically filed the foregoing *Consent Motion for Extension of Time* with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

James W. Hurt, Esq.
HURT STOLZ, P.C.
345 West Hancock Ave.
Athens, Georgia 30601
Counsel for Plaintiff

This 28th day of September 2017.

/s/ Mark J. Windham

Mark J. Windham
Georgia Bar No. 113194